



Via Federal Express and electronic mail

November 5, 2010

Ms. Ingrid H. Hopkins  
Water Protection Division (3WP42)  
U.S. EPA - Region III  
1650 Arch Street  
Philadelphia, PA 19103-3029  
(215) 814-5437  
[hopkins.ingrid@epa.gov](mailto:hopkins.ingrid@epa.gov)

**RE: Benning Road Generating Station – NPDES Permit No. DC 0000094  
Metal Excursions – Outfall 013Q**

This letter is a follow-up to the November 2, 2010 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff, EHS Manager, who reported on copper, iron, and zinc excursions in a grab sample of storm water taken on October 14, 2010 from Outfall 013.

On November 2, Ms. Brinkerhoff received the laboratory analysis indicating daily maximum concentrations for copper, iron and zinc were exceeded. Ms. Brinkerhoff made the required telephone notification pursuant to NPDES permit condition VI.6 to the USEPA.

Lab results indicated the following:

Analyte	Units	Permit Limit Daily Max	Results
Copper	ug/L	13.44	27.0
Iron	mg/L	1.0	2.2
Zinc	ug/L	117.18	210.0

Investigation of the excursions included a review of historical metal concentrations to obtain baseline storm water sample data. Specifically, storm water sample data gathered during the previous NPDES permit period for the Benning Generation Facility indicates that the November 2, 2010 values are comparable to historical values. That is, these concentrations are similar to typical metal concentrations found in storm water samples dating back several years.

On July 19, 2010, the facility submitted a TMDL Implementation Plan to EPA, as required by NPDES permit condition VII.E. The TMDL Implementation Plan provided information on past, current, and planned activities at the facility to meet the required load reductions for the Anacostia River TMDLs for metals. EPA approved the TMDL plan on September 28, 2010. We are currently moving forward with the initial steps in the TMDL plan that include additional storm

1300 North 17<sup>th</sup> Street • Suite 1600 • Arlington • VA • 22209 • 703-253-180 • Fax 703-253-1799 •  
[www.pepcoenergy.com](http://www.pepcoenergy.com)

*Pepco Energy Services, Inc. is not the same company as Potomac Electric Power Company (Pepco), the regulated utility, and prices and services of Pepco Energy Services, Inc. are not set by the Public Service Commission.*

Nov 2, 2010

Heather D Brinkerhoff  
Beining Station

Oct. 14. { dm: Copper, zinc, iron  
SW sample Outfall 013

just rec'd prelim. lab results  
today Nov 2, 2010



Benning Generation Facility NPDES Metals Excursion Follow Up Letter

Shirley Harmon

to:

Ingrid Hopkins

11/05/2010 01:52 PM

Show Details

1 Attachment



PES letter to EPA\_follow up to 11-2-2010 notification.pdf

Dear Ms. Hopkins,

Please find attached, a letter of explanation concerning the metals excursions at the Benning Generating Station that was reported to you by phone on 11-2-2010. I am also sending you this letter by Federal Express.

If you have any questions, please contact me.

Respectfully yours,  
Shirley Harmon

*Shirley H. Harmon*

Power Plant Asset Manager

Pepco Energy Services, Inc.

(O) 703-253-1787

(F) 703-253-1799

(M) 202-841-1344